

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

Case No. 15-30125

The Archdiocese of Saint Paul and  
Minneapolis,

Chapter 11

Debtor.

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**UNSWORN DECLARATION OF JEFFREY R. ANDERSON**

1. The undersigned, Jeffrey R. Anderson, submits this Declaration in support of the motion (the "Motion") of the Official Committee of Unsecured Creditors (the "Committee") for substantive consolidation.

2. I am an attorney with the law firm of Jeff Anderson & Associates, P.A. representing Certain Personal Injury Creditors in the above-captioned bankruptcy case filed by The Archdiocese of Saint Paul and Minneapolis (the "Archdiocese").

3. Attached hereto as Exhibit 1 is a copy of a chart summarizing parish and other Catholic entity loans guaranteed by the Archdiocese.

4. Attached hereto as Exhibit 2 is a Summary Statement of Financial Position for the Catholic Finance Corporation dated June 30, 2008.

5. Attached hereto as Exhibit 3 is Archdiocesan Parish Financial Report Instruction Booklet for Fiscal Year Ended June 30, 2010.

6. Attached as Exhibit 4 is a chart of 2006 Archdiocesan parish finances.

7. Attached as Exhibit 4A are excerpts of the 2006 Archdiocesan parish finances.

8. Attached as Exhibit 5 is a chart of 2007 Archdiocesan parish finances.

9. Attached as Exhibit 5A are excerpts of the 2007 Archdiocesan parish finances.

10. Attached as Exhibit 6 is a chart of 2008 Archdiocesan parish finances.
11. Attached as Exhibit 6A are excerpts of the 2008 Archdiocesan parish finances.
12. Attached as Exhibit 7 is a chart of 2009 Archdiocesan parish finances.
13. Attached as Exhibit 7A are excerpts of the 2009 Archdiocesan parish finances.
14. Attached as Exhibit 8 is a chart of 2010 Archdiocesan parish finances.
15. Attached as Exhibit 8A are excerpts of the 2010 Archdiocesan parish finances.
16. Attached as Exhibit 9 is a chart of Archdiocesan parish financials 2000-2006.
17. Attached as Exhibit 10 are various Archdiocesan parish financial reports.
18. Attached as Exhibit 11 is a Catholic Cemeteries Purchase Agreement.
19. Attached as Exhibit 12A and 12B is information from the Catholic Cemeteries website.
20. Attached as Exhibits 13A-J are photos of Resurrection Catholic Cemeteries.
21. Attached as Exhibits 14A-N are photos of Calvary Catholic Cemeteries.
22. Attached as Exhibits 15A-J are photos of Gethsemane Catholic Cemeteries.
23. Attached as Exhibits 16A-I are photos of St. Mary's Catholic Cemeteries.
24. Attached as Exhibits 17A-E are photos of St. Anthony's Catholic Cemeteries.

I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Dated: May 23, 2016



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Jeffrey R. Anderson